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May 24, 2002

The Honorable Christine Todd Whitman
Administrator
U.S. Environmental Protection Agency
Ariel Rios Building
Room 3000, #1101-A
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

Subject: Comments on the ACC's HPV Test Plan for the Formates Category

Dear Administrator Whitman:

The following comments on the American Chemistry Council's (ACC's) test plan for the formic acid and formates category are submitted on behalf of the Physicians Committee for Responsible Medicine, People for the Ethical Treatment of Animals, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal protection, and environmental organizations have a combined membership of more than nine million Americans.

The ACC's test plan for formates addresses a logically circumscribed group of compounds and reflects a concise presentation of robust summaries. The ACC intends to draw on existing data and correlate systematic structural changes with changes in toxicity for nearly all SIDS endpoints. While we appreciate the ACC's thoughtful approach to characterizing these chemicals, we contend that this analysis should be extended to eliminate the proposed combined reproductive/developmental toxicity test for sodium formate which will kill another 400 animals.

The members of the formates category are the simplest of the carboxylic/carboxyl compounds. Their behavior and metabolism are extremely well understood. The abundant existing information should be used to address the developmental toxicity endpoint. Furthermore, the toxicity of formic acid is being addressed by the ICCA program. The ACC should use the results from the ICCA tests to further reduce testing on animals.

In addition, this category could easily be combined with the acetic acids and salts and with other carboxylic acids to form a larger category, or it could be included in the methanol category. Methanol toxicity is a function of formate toxicity.[1] Specifically, the toxicity of methanol for a specific species depends on that species' ability to metabolize formate. Because of this clear connection and the existing abundant data on the developmental, reproductive, and genetic toxicity of methanol, any further screening-level toxicity tests with formate are clearly inappropriate. The metabolism, toxicity, and hazard associated with all these compounds are well understood, and no more animals should be subjected to suffering and death to test them.

Thank you for the opportunity to comment. If you have any questions, please contact Jessica Sandler at 757-622-7382, ext. 1304 or via e-mail at *jessicas@peta.org.*

Sincerely,

Nicole Cardello, M.H.S.
Staff Scientist

1. The American Methanol Institute Testing Group. Robust Summary for Methanol. Washington, DC 2001. *http://www.epa.gov/chemrtk/methanol/c13104tc.htm*